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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION

In Re: §  
John Manuel Montez § Case No.  
Sharen Louise Montez § 09-70584-HDH-13  
Debtors § Chapter 13

DEBTORS' MOTION TO EXTEND AUTOMATIC STAY

Comes Now Debtors, by counsel, and for this Motion state as follows:

1. Debtors filed for relief under Chapter 13 in the Northern District of Texas. This is a core proceeding. Debtors were debtors in a prior case during the preceding year. To-wit: Chapter 13, Case No. 08-70322-HDH-13 filed on 8/7/2008.
2. Debtors seek an extension of the automatic stay imposed for 30-days pursuant to 11 U.S.C. §362(c)(3)(A), as to all creditors until further order or discharge to effectuate an orderly reorganization, pursuant to 11 U.S.C. §362(c)(3)(B).
4. Debtors' prior case was dismissed for: Debtor stopped working as an independent driver in March of 2009. He was out of work until July 10, 2009. Joint Debtor worked as a substitute teacher, working as needed.
5. The following changes of circumstances demonstrate that the Debtors can perform this plan and are likely to complete the case successfully: Debtor's now employed as a truck driver, full time for Con-Way Freight and will have the Trustee payment deducted from his pay check weekly. Joint Debtor is currently working part time for McDonald's.

WHEREFORE, Debtors' request this Court enter its order continuing the automatic stay under §362(a) in this proceeding as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2) or a motion for relief is granted under §362(d).

Respectfully submitted,

/s/Monte J. White  
Attorney for Debtors

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Motion and Notice of Hearing was served electronically by the ECF System or by First Class Mail on November 19, 2009 on all parties on the mailing matrix:

/s/Monte J. White  
Attorney for Debtors

Attorney General of Texas  
Shelly Horton  
4630 50th Street, Suite 300  
Lubbock, TX 79414

JC Penney  
Attention: Bankruptcy Department  
PO Box 103106  
Roswell, GA 30076

Titanium Emergency Group  
P.O. Box 3407  
Emergency room Physician  
Wichita Falls, Texas 76301

Capital One Bank  
PO Box 85520  
Richmond, VA 23285

Maverick Finance  
PO Drawer 811  
Spartanburg, SC 29304

Triad Financial Corporation  
5201 Rufe Snow Ste 400  
North Richland Hills, TX 76180

Curtis O. Barnes, PC/Bestbuy  
PO Box 1390  
Anaheim, CA 92815-1390

Medi Comm Services/NTS Communications  
5139 69th St  
Lubbock, TX 79424

Tribute  
PO Box 105555  
Atlanta, GA 30348

Datasearch/United Regional  
PO Box 461289  
San Antonio TX 78246-1289

Midland Credit Mgmt/Household  
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San Diego, CA 92123

TXU Energy  
200 W John Carpenter Fwy  
Irving, TX 75039

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Portfolio Recoveries/The Credit  
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Norfolk, VA 23541

Verizon Wireless  
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Hsbc Bank  
Po Box 5253  
Carol Stream, IL 60197

Powerhouse Gym  
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Wichita Co, City of Burk,Burkbu:  
c/o Harold Lerew  
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Wichita Falls, TX 76307-8188

HSBC/Bestbuy  
Po Box 15519  
Wilmington, DE 19850

Sallie Mae Servicing  
1002 Arthur Dr  
Lynn Haven, FL 32444

Wichita Furniture  
1000 Indiana St  
Wichita Falls, TX 76301

HSBC/ORCHARD BK  
ATTN: BANKRUPTCY  
PO BOX 5253  
Carol Stream, IL 60197

Target National Bank  
PO Box 9475  
Minneapolis, MN 55459

Wilshire Credit Corp  
PO Box 8517  
Portland, OR 97207-8517

IRS Special Procedures  
1100 Commerce St., Room 951  
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Dallas, TX 75246

The Cash Store  
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Wichita Falls, TX 76308

Wilshire Credit Corp  
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Portland, OR 97207-1650

World Finance Corp  
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Wichita Falls, TX 76301

Zales/Citibank  
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